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FORMER PARAGON OIL TERMINAL

Address: 16, 42, 50 Bridgewater Street, Brooklyn, New York 11222
Tax Lot Parcel(s): Brooklyn Block 2666, Lot 1; Block 2666, Lot 52; Block

2666, Lot 125;

Latitude: 40° 43′ 40.461″ N Longitude: 73° 56′ 8.8434″ W

Regulatory Programs/Numbers/Codes: Consent Order No. D2-1111-01-09AM

Analytical Data Status:

☑ Electronic Data Available ☐ Hardcopies only

☐ No Data Available

1.0 SUMMARY OF CONSTITUENTS OF POTENTIAL CONCERN (COPCS) TRANSPORT PATHWAYS TO

THE CREEK

The current understanding of the transport mechanisms of contaminants from the upland portions of the former Paragon Oil Terminal site to Newtown Creek is summarized in this section and Table 1. A finished petroleum products terminal was operational on the site from 1934 to 1958 (Paragon Oil) and from 1959 to 1968 (Texaco). Neither company ever maintained petroleum refinery operations on the site.

1.1 Overland Transport

Overland transport is currently not a complete pathway for transport of any CPOCs to Newtown Creek due to the high level of development on the site. Greater than 95% of the site surface area is either paved or covered by buildings. No specific evidence of overland transport was identified in the historical and available site records. All finished petroleum products were stored in structures such as USTs and ASTs. In addition the storage of gasoline in USTs removed the potential for a complete overland pathway. There is insufficient evidence to indicate that the historical pathway was complete. The current pathway is incomplete.

1.2 Bank Erosion

The northern boundary of the site is located adjacent to Newtown Creek and is armored by bulkheads. Approximately 600 linear foot of steel sheet-pile bulkhead spans the western shoreline. A wooden bulkhead approximately 500 linear feet in length spans the eastern shoreline. There is no apparent potential for erosion and therefore the current bank erosion pathway is not considered complete. During terminal operations from 1934 to 1968 the shoreline was lined with bulkheads. No specific evidence of bank erosion was identified in the historical and available site records. There is insufficient evidence to indicate that the historical pathway was complete. The current pathway is incomplete.

Newtown Creek RI/FS

1.3 Groundwater

In 1991, 23 years after terminal operations ceased, an LNAPL seep into the creek began. As part of the approved remedial action a total fluids recovery system was constructed and maintains a constant reversed hydraulic gradient inland from Newtown Creek during both high and low tides along the entire length of the former 1990 LNAPL seep location. This system has been operating since September 14, 2007. In addition a grout wall was installed behind the steel bulkhead in the former seep area to support the recovery system in mitigating the seep. The seep into Newtown Creek has been mitigated. Groundwater chemistry for CPOCs indicates that the majority of the dissolved-phase contamination exists in proximity to the LNAPL plume associated with the former seep. Groundwater is currently not a complete pathway.

The natural groundwater flow is, generally, from south to north across the property towards Newtown Creek. Since Newtown Creek is a tidal water body, the local groundwater immediately behind the bulkhead experiences tidal fluctuations. The current remedial system maintains hydraulic control under both high and low tidal conditions, with a continuous inward gradient from the Creek onto the site. However prior to the current remedial action, groundwater did discharge to the creek during low tide cycles. Therefore groundwater was a complete pathway during time when the seep began in 1991 until mitigation of the seep with the operation of the total fluids recovery system by the end of 2010. The hydraulic control provided by Texaco's system is also having the beneficial effect of addressing offsite sources of contamination that have migrated on to the Texaco site and are attributable to others." Groundwater is not a current pathway.

1.4 Overwater Activities

There are currently no over water activities at the site as it is currently a liquor distribution facility. Therefore this potential pathway is not currently complete. When the terminal was operational incoming finished petroleum products were offloaded by barge at the bulkhead area. A review of historical information did not suggest any other type of overwater activities. Terminal operations occurred between 1934 and 1968 and no records of spills have been located. Storage of the finished petroleum products was a primary function of terminal operations. Storage facilities included barges, pipes, and tanks. There was a much greater level of protection against spills in comparison to activities such as transport in open barges (coal, gravel, trash) and storage in open areas or bins on properties. There is insufficient evidence to indicate this pathway was historically complete

1.5 Stormwater/Wastewater Systems

The current storm water system captures runoff from the paved areas and the buildings on site via existing catch basins and conveys the stormwater through sub grade pipes to existing outfalls for discharge to Newtown Creek. Stormwater is potentially a complete pathway with respect to current conditions.

The total fluids recovery system separates the recovered LNAPL and groundwater using a primary fractionation tank and then an oil water separator (OWS). Recovered LNAPL is recycled off site. The groundwater is treated first with bag filters and an organoclay filtration unit and then with granular activated carbon. The treated groundwater is discharged to the sanitary sewer system in accordance

Newtown Creek RI/FS

with a NYCDEP permit. Permit compliance monitoring occurs on a quarterly basis and the system has been compliant since startup in September 2007. Wastewater is not a current complete pathway.

In a 1959 Water Pollution Control Board document, Paragon Oil Company was identified as having an 8-inch diameter private outfall pipe to the creek. The discharge, which consisted of condensate from heaters and other steam consumers, washing and cleaning, and yard drainage, was pretreated with a four compartment oil water separator. The document also notes that the facility had a private sewer connected to the city sewer.

A 1960 New York City Survey Series Report No. 4 identified the OWS as being used for treatment of water from heating coils, truck washing, and surface drainage. A 1965 Bureau of Water Resource Services (NYSDOH) identified truck wash as being treated by an OWS and sewage by septic tanks.

1.6 Air Releases

A twice annual ambient air monitoring program has been ongoing since 2005. The outdoor and indoor sample results indicate the site air has not been adversely impacted. The current air pathway is not complete.

Information related to air releases was not identified in the available historical information reviewed. However, historical site information including aerial photographs did not show the presence of process units and associated air discharge stacks. This is consistent with terminal operations. There is insufficient evidence to indicate that the historical pathway to Newtown Creek was complete.

Table 1	
Potential Areas of Concern and Transport Pathways Assessment - Former Paragon Oil Terminal	

Potential Areas of Concern		Medi	a Imp	acted			COPCs Potential Complete Pathway																		
Description of Areas of Concern	Surface Soil	Subsurface Soil	Groundwater	Catch Basin Solids	Creek Sediment	Gasoline-Range	Diesel-Range	Heavier-Range	Petroleum Related (BTEX)	VOCs	Chlorinated VOCs	SVOCs	PAHs	Phthalates	Phenolics	Metals	PCBs	Herbicides and Pesticides	Dioxins/Furans	Overland Transport	Groundwater	Direct Discharge - Overwater	Direct Discharge - Stormwater/Wastewater	Discharge to Sewer/CSO	Bank Erosion
Former Paragon Oil Terminal			✓		?	✓	\	✓	✓	~	***	~	X		į						*			**	

Notes:

- ✓- COPCs are/were present in Areas of Concern and have a current or historical, complete or potentially complete pathway
- ? Not enough information to make a determination
- --- Pathway is shown to be not present or incomplete
- * There is no evidence of a completed pathway during terminal operational years (1934 to 1968). The pathway was complete from 1991 to approximately 2010. The pathway is currently incomplete.
- ** There is no evidence of a complete pathway during terminal operational years (1934 to 1968); current discharge from the recovery system undergoes pretreatment onsite prior to discharge to the sanitary sewer system in compliance with a NYCDEP permit.
- *** Isolated detections at one well on site likely attributed to upgradient and offsite sources

COPCs - Constituents of Potential

Concern

NOTE: The table above presents information with respect to "Potential Complete Pathways" for historical conditions. Currently all pathways on the site are incomplete

2.0 PROJECT STATUS

A summary of the investigation and remedial activities is provided in the table below.

Activity		Date(s)/Comments
Phase 1 Environmental Site Assessment	X	Prior to 2005 initial site characterization and interim remedial measures activities were completed by Roux Associates, on behalf of ExxonMobil;
Site Characterization	X	Site-wide investigation was completed from 2005 to 2007; summarized in Site Characterization Reports dated October 2006, February 2007, and October 2010;
Remedial Investigation	X	See Site Characterization discussion.
Remedy Selection	X	The seep mitigation remedy consists of a groundwater & LNAPL recovery system, a grout wall barrier, and sealed seams in the bulkhead. Selections completed in 2005 and 2006;
Remedial Design/Remedial Action Implementation	X	Phase I Remedial designs were competed in 2006; the grout wall was installed in 2006; the recovery system was activated in September 2007; Phase II remedial upgrades were designed in 2009; Site wide Alternatives Analysis Reports for GW, LNAPL, Soil & Soil Vapor submitted in 2011;
Use Restrictions (Environmental Easements or Institutional Controls)	X	The site has a zoning classification of M3-1, heavy manufacturing zoning district;
Construction Completion	X	Installation of the grout wall behind the steel sheet-pile bulkhead in November 2006; completion of the Phase I total fluids recovery system in September 2007; completion of the seam-sealing of the steel sheet-pile bulkhead in the summer of 2008; initiation of the warehouse slab maintenance sealing activities in 2008 (continues to present); the completion of the Phase II total fluids recovery system upgrades in 2009; and the completion of the voluntary Subslab Depressurization System in 2010.
Site Closeout/No Further Action Determination		Not applicable at this time

• NYSDEC Site Code(s): S224083

• NYSDEC Site Manager: Mr. Ed Hampston, PE; Albany, NY

3.0 SITE OWNERSHIP HISTORY

Respondent Member: Yes 🗵 No (Respondent is not the current owner)

Year	16 Bridgewater Parcel A (Lot 125)	16 Bridgewater Parcel B (Lot 125)	42 Bridgewater (Lot 52)	50 Bridgewater (Lot 1)
Pre-1920	-	-	ACME Food Products Corp.	-
1920-1930	-	-	Abington Chemical Works (Sub-Lease)	-
Pre-1928	_	-	_	Heirs of A. Cram
1928-1934	-	-		Brooklyn Ash Removal Co.
pre-1931	Clifford L. Miller	Clifford L. Miller	_	_
1934	_	_		Bridgewater Oil Co.
1934-1959	Paragon Oil	Paragon Oil	Paragon Oil	Paragon Oil
1959-1968	Texaco	Texaco	Texaco	Texaco
1968-2006	Peerless Importers	Peerless Importers	Peerless Importers	Peerless Importers
2007-current	Peerless Equities, LLCs	Peerless Equities, LLC	Peerless Equities, LLC	Peerless Equities, LLC

4.0 PROPERTY DESCRIPTION

The 11 acre former Paragon Oil terminal site borders Newtown Creek on the north, Meeker Avenue on the east, Bridgewater Street on the south, and the 100-120 Apollo Street property on the west. The former terminal was a distributor of fuel oils (#'s 2, 4, and 6), lubricating oil, leaded gasoline, diesel fuel, and kerosene. The terminal did not store crude oil, naphtha, or unleaded gasoline. The terminal contained two truck loading racks, several USTs and ASTs, transfer pipes and pumps, a motor oil canning warehouse, and a boiler room for steam generation. Terminal operations ceased in 1968.

Currently, greater than 95% of the site surface is covered by asphalt or warehouses. The entire shoreline is lined with bulkheads. A steel bulkhead installed in 2000 spans the western two-thirds of the shoreline. A competent wooden bulkhead lines the eastern third of the shoreline.

5.0 CURRENT SITE USE

Currently, the 11 acre property is owned by Peerless Equities, LLC and is a series of interconnected warehouses that cover 8 acres of the property. The remainder of the property is comprised of truck parking, car parking, and truck loading bays. The site has limited access and is secured by chain-link fencing with razor wire with access control points monitored by security. Currently, the facility

operates a wholesale wine and spirits distribution business from the warehouses located at the site. Nearly the entire surface of the site is covered with concrete warehouse floors or asphalt pavement. Office space is located on the south side of the property at 16 and 50 Bridgewater Streets and conference rooms are also located on the north side of the property at 50 Bridgewater Street.

6.0 SITE USE HISTORY

The Paragon Oil Company maintained terminal operations at the site between 1934 and 1958. In 1958, Texaco continued petroleum terminal operations until 1968, when the terminal was closed and the property sold to Peerless Importers (currently Peerless Equities, LLC). The former Paragon Oil terminal stored finished petroleum products including diesel fuel, No. 2 fuel oil, No. 4 fuel oil, No. 6 fuel oil, lubricating oil, leaded gasoline and kerosene. The site has a zoning classification of M3-1, heavy manufacturing zoning district.

Mobil operated the Locust Hill Refinery on the site. At some point in time, Mobil consolidated the Locust Hill Refinery into its Sone and Fleming Refinery, which was Mobil's largest refinery on Newtown Creek. The Locust Hill refinery operations terminated sometime prior to Paragon's entry on to the property.

7.0 CURRENT A ND HISTORICAL AREAS OF CONCERN AND COPCS

7.1 Uplands

In 1978, a petroleum sheen was observed seeping into Newtown Creek at the base of Meeker Avenue (offiste) by the United States Coast Guard (USCG). This discovery led to an investigation by Geraghty & Miller, Inc., to determine the source of the seep and the extent of LNAPL present in the subsurface. Key findings from the USCG commissioned report prepared by Geraghty & Miller are indicated below:

- "14. Based on the evidence of a majority of laboratories and physical evidence, the product appears to be predominantly a petroleum distillate with a minor amount of refined products."
- "23. A former Paragon Oil Company storage facility situated along Bridgewater Street and operated until 1935 is not the source, as it did not store the type of product found in the subsurface. In addition, test drilling at this site shows that the spill did not originate from this site."

In 1991, 23 years after the terminal shut down, an LNAPL seep was identified emanating from the former Paragon site bulkhead into Newtown Creek. Remediation efforts were implemented by Roux Associates from 1991 to 2005. In 2005 Texaco entered into a consent order with the NYSDEC and commenced characterization and corrective actions.

7.2 Overwater Activities

The terminal received finished petroleum products by barge at the bulkheads along the north property boundary. Aerial photographs have shown enclosed barges along the bulkhead and historical map information shows off loading transfer pipes at the bulkheads. The pipelines were connected to both ASTs and USTs.

7.3 Spills

There are no documented spills for the site associated with the historical terminal operations. Data collected on spills reported to the NYSDEC were searched as well historical newspaper accounts from the area.

In 1882, when the Mobil Locust Hill Oil Refinery \was operating, a lightning strike ignited a fire and a release at the refinery was reported in the September 16, 1882 New York Times.

8.0 PHYSICAL SITE SETTING

8.1 Geology

The site is underlain by a unit of fill material that was put in place prior to 1900 based on available information. The fill is comprised of coarse-textured sand and gravel with man-made artifacts such as bricks, nails, glass, and other man-made materials. There exists a naturally occurring alluvial silt layer under the fill zone that extends from Newtown Creek southward toward Bridgewater Street. On the western part of the site the silt layer does not extend to Bridgewater Street. This alluvial silt zone was the base of Newtown Creek prior to 1886. Both the free water table and the upper surface of the LNAPL zone are present within the fill zone and above the alluvial silt layer. Underlying the alluvial silt layer at two locations are naturally occurring peat zones, and at greater depth, the native alluvial sand and gravel zone is present. On the Bridgewater Street side of the site, the alluvial sand and gravel is directly beneath the fill.

Figure 1 presents a stratigraphic cross section perpendicular to the creek while Figure 2 presents a stratigraphic cross section parallel to the creek.

8.2 Hydrogeology

As previously stated, the water table and the LNAPL are present underneath the site within the upper fill zone Figure 3 presents a concept diagram of the reversed hydraulic gradient that is created and maintained by the total fluids recovery system that is operating behind the bulkhead. Figure 4 presents an actual low tide data set indicating the pumping groundwater elevations behind the bulkhead are all below the elevation of the creek surface water elevation. The maintenance of this reversed hydraulic gradient has been effective in mitigating the seep. Figure 5 presents the LNAPL and groundwater capture zone induced by each of the recovery wells behind the bulkhead at low tide. The reversed inward gradient created by the pumping behind the bulkhead ensures that both groundwater and PSH do not seep into Newtown Creek.

9.0 NATURE AND EXTENT (CURRENT UNDERSTANDING OF ENVIRONMENTAL CONDITIONS)

9.1 Soil

9.1.1 Soil Investigations ✓ Yes No

Thirty-seven soil borings were completed on the Paragon site between July 2005 and July 2007. Most borings were completed using rotosonic drilling techniques and were continuously sampled to depth. Due to low overhead clearance, two borings were completed using direct push technologies, and continuously sampled to their total depth. All of these borings were completed under the direction of SAIC. Once a boring location was chosen, the first five (5) feet of each borehole was advanced using non-intrusive techniques (water knife).

Field Soil Descriptions

Continuous soil samples were collected at each boring location and the physical and morphological properties of the soil were documented in the field using the Unified Soil Classification System. In an effort to maintain consistency among field personnel, all soils were described using the following parameters: Munsell color, USCS group name and symbol, estimated grain size composition (%), angularity, plasticity, moisture, consistency, odors, presence stratifications, and the presence of fill material containing manmade artifacts.

Field Screening Methods

Soil samples collected in the field were screened for the relative concentration of petroleum volatile organic compounds (VOCs) using both a photoionization detector (PID) and a flame ionization detector (FID).

Laboratory Analyses

From the boring completed in 2005 and 2006 one soil sample was collected from each boring for laboratory analysis. Each soil sample was collected from the interval yielding the highest volatile reading in the vadose zone as measured with a PID. Samples were collected for analysis of NYSDEC STARS List Compounds for Gasoline & Fuel Oil parameters. All soil chemical analyses were completed by either Severn Trent Laboratories (STL) of Edison, New Jersey, or Test America in Nashville, Tennessee.

In 2007 multiple soil samples were collected from each boring location for laboratory analysis. Soil samples were collected from the depth yielding the highest volatile field reading in the vadose zone for each five foot core interval. The sample approach was completed for the saturated zone. Samples were collected for analysis of NYSDEC STARS List Compounds for Gasoline & Fuel Oil parameters.

9.1.2 Bank Samples Yes I No

The western two-thirds of the site contain a steel bulkhead with an asphalt surface landside. There is no bank soil in this area. The eastern third contains a wooden bulkhead that has a limited vegetated

area between the bulkhead and the asphalt parking lot. Bank soil samples have not been collected from this area. However this area of the site did not contain terminal infrastructure.

9.1.3 Soil Summary

A summary of soil sample analytical results is presented in Table 2. There are limited impacts to the unsaturated zone soil. Limited volatile petroleum compounds exceed the commercial use soil standards. Low concentrations of PAHs are present in the unsaturated zone soil. The parent PAHs are primarily of pyrogenic origin with urban fill as the source of the PAHs. Pyrogenic PAHs are not commonly found in petroleum products and are more representative of products of combustion.

Table 2 Summary of Soil COPC Chemistry Former Paragon Oil Terminal Greenpoint, Brooklyn, NY

		NYSDEC Restricted Use Standards		Soil Conce	entration
Analyte	Units	Commercial	Industrial	Minimum	Maximum
Surface (0-2 ft below ground	l surface)				
1,2,4-Trimethylbenzene	mg/kg	190	380	ND	0.065
1,2-Dichloroethane	mg/kg	30	60	ND	ND
1,3,5-Trimethylbenzene	mg/kg	190	380	ND	0.039
Acenaphthene	mg/kg	500	1000	0.27	0.36
Acenaphthylene	mg/kg	500	1000	ND	0.097
Anthracene	mg/kg	500	1000	0.22	1.4
Benzene	mg/kg	44	89	ND	0.32
Benzo(a)anthracene	mg/kg	5.6	11	0.37	1.5
Benzo(a)pyrene	mg/kg	1	1.1	0.24	0.97
Benzo(b)fluoranthene	mg/kg	5.6	11	0.48	1.7
Benzo(g,h,i)perylene	mg/kg	500	1000	0.13	0.78
Benzo(k)fluoranthene	mg/kg	56	110	ND	0.49
Chrysene	mg/kg	56	110	0.41	1.4
Dibenz(a,h)anthracene	mg/kg	0.56	1.1	0.04	0.19
Ethylbenzene	mg/kg	390	780	ND	0.2
Fluoranthene	mg/kg	500	1000	1.6	5.4
Fluorene	mg/kg	500	1000	ND	0.63
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	11	0.12	0.71
Lead	mg/kg	1000	3900	124	35.4
Methyl-t-Butyl Ether					
(MTBE)	mg/kg	500	1000	ND	ND
Naphthalene	mg/kg	500	1000	ND	8.9

			1		
n-Butylbenzene	mg/kg	500	1000	ND	0.008
n-Propylbenzene	mg/kg	500	1000	ND	0.044
Phenanthrene	mg/kg	500	1000	0.84	3.2
Pyrene	mg/kg	500	1000	1.2	4.5
sec-Butylbenzene	mg/kg	500	1000	ND	0.005
tert-Butylbenzene	mg/kg	500	1000	ND	ND
Toluene	mg/kg	500	1000	ND	0.015
Xylenes, total	mg/kg	500	1000	ND	0.3
Sub-Surface (>2 ft below gr	ound surfac	re)			
1,2,4-Trimethylbenzene	mg/kg	190	380	ND	1440
1,2-Dichloroethane	mg/kg	30	60	ND	ND
1,3,5-Trimethylbenzene	mg/kg	190	380	ND	639
Acenaphthene	mg/kg	500	1000	ND	7.32
Acenaphthylene	mg/kg	500	1000	ND	2.3
Anthracene	mg/kg	500	1000	ND	18
Benzene	mg/kg	44	89	ND	226
Benzo(a)anthracene	mg/kg	5.6	11	ND	22
Benzo(a)pyrene	mg/kg	1	1.1	ND	19
Benzo(b)fluoranthene	mg/kg	5.6	11	ND	22
Benzo(g,h,i)perylene	mg/kg	500	1000	ND	9.9
Benzo(k)fluoranthene	mg/kg	56	110	ND	20
Chrysene	mg/kg	56	110	ND	20
Dibenz(a,h)anthracene	mg/kg	0.56	1.1	ND	2.7
Ethylbenzene	mg/kg	390	780	ND	460
Fluoranthene	mg/kg	500	1000	ND	55
Fluorene	mg/kg	500	1000	ND	11.8
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	11	ND	9.4
Lead	mg/kg	1000	3900	0.547	2220
Methyl-t-Butyl Ether					
(MTBE)	mg/kg	500	1000	ND	0.013
Naphthalene	mg/kg	500	1000	ND	266
n-Butylbenzene	mg/kg	500	1000	ND	146
n-Propylbenzene	mg/kg	500	1000	ND	203
Phenanthrene	mg/kg	500	1000	ND	58
Pyrene	mg/kg	500	1000	ND	48
sec-Butylbenzene	mg/kg	500	1000	ND	49.1
tert-Butylbenzene	mg/kg	500	1000	ND	2.72
Toluene	mg/kg	500	1000	ND	56.1
Xylenes, total	mg/kg	500	1000	ND	1810
Notes:					

Notes:

mg/kg - milligrams per kilogram

ND - Non-detect

9.2 Groundwater

Groundwater Investigations ⊠Yes No

LNAPL Presence (Historical & Current) ⊠ Yes No

Visual Seep Sample Data Yes ⊠ No

9.2.1 Groundwater Investigations

Texaco has been completing annual groundwater sampling events since 2010. Groundwater samples were collected from monitoring wells that did not contain LNAPL and were collected using USEPA low-flow collection protocols. All samples were analyzed for the NYSDEC STARS gasoline and fuel oil compounds. In addition, approximately 10% of the samples were analyzed for TCL VOCs and SVOCs, dissolved RCRA metals, total dissolved solids (TDS), and Arochlors. The samples were analyzed by TestAmerica Laboratories using Methods 8260B, 8270C, 8082, 6010B, 7470A, and 2540C.

9.2.2 LNAPL

Currently, 18 monitoring wells onsite have a measurable LNAPL thickness while 39 wells onsite do not contain LNAPL. The subsurface LNAPL extent is interpreted to extend across nearly the entire area of 50 Bridgewater Street, and about two thirds of 42 Bridgewater Street. At 16 Bridgewater Street limited LNAPL exists in the south east portion of the lot. Figure 6 depicts the interpretation of the current LNAPL extent on the site.

9.2.3 Groundwater Summary

A groundwater data summary is presented in Table 3 and Table 4. Groundwater impacts mirror the LNAPL plume. The primary compounds impacting the groundwater are BTEX compounds and other petroleum related volatile compounds. A limited extent of pyrogenic PAHs at low concentrations is present in the groundwater. Arochlors are not present in the groundwater on the Paragon site. At one well location, CMW-24S, chlorinated VOC degradation products are present. The chlorinated VOCs are absent from the groundwater at 9 additional monitoring well locations on the site.

	Table 3
Summary of Gro	undwater Hydrocarbon COPC Chemistry
Fo	rmer Paragon Oil Terminal
	Greenpoint, Brooklyn, NY

					dwater
	1	Water Q	uality Standard	Concer	ntration
Analyte	Units	Aesthetic	Human Health	Minimum	Maximum
1,2,4-Trimethylbenzene	ug/L		5	ND	190
1,3,5-Trimethylbenzene	ug/L		5	ND	130
Acenaphthene	ug/L	20		ND	140
Anthracene	ug/L		50	ND	1.6

ug/L		1	ND	4800
ug/L		0.002	ND	1.2
ug/L			ND	1.9
ug/L		0.002	ND	ND
ug/L		0.002	ND	ND
ug/L		0.002	ND	0.33
ug/L		5	ND	900
ug/L		50	ND	3.1
ug/L		50	ND	45
ug/L		0.002	ND	1.3
ug/L		5	ND	41
ug/L		10	ND	200
ug/L		5	ND	970
ug/L	10		ND	77
ug/L		5	ND	8.8
ug/L		5	ND	61
ug/L		5	ND	36
ug/L		5	ND	5.2
ug/L		50	ND	28
ug/L		50	ND	1.6
ug/L		5	ND	4.4
ug/L		5	ND	ND
ug/L		5	ND	100
	ug/L ug/L ug/L ug/L ug/L ug/L ug/L ug/L	ug/L ug/L ug/L ug/L ug/L ug/L ug/L ug/L	ug/L 0.002 ug/L 0.002 ug/L 0.002 ug/L 0.002 ug/L 5 ug/L 50 ug/L 5 ug/L 50 ug/L 5 ug/L 5	ug/L 0.002 ND ug/L 0.002 ND ug/L 0.002 ND ug/L 0.002 ND ug/L 5 ND ug/L 50 ND ug/L 50 ND ug/L 0.002 ND ug/L 5 ND ug/L 10 ND ug/L 5 ND ug/L 50 ND ug/L 5 ND

Notes:

ug/L - micrograms per liter

ND - Non-detect

Table 4 Summary of Groundwater TAL COPC Chemistry Former Paragon Oil Terminal Greenpoint, Brooklyn, NY

		Water Qu	ality Standard	2010-2011 Gro Concentra	
Analyte	Units	Aesthetic	Human Health	Minimum	Maximum
VOCs					
1,1,1-Trichloroethane	ug/L		5	ND	ND
1,1,2,2-Tetrachloroethane	ug/L		5	ND	ND

	1 1				
1,1,2-Trichloro-1,2,2-trifluoroethane	ug/L		5	ND	ND
1,1,2-Trichloroethane	ug/L		1	ND	ND
1,1-Dichloroethane	ug/L		5	ND	ND
1,1-Dichloroethene	ug/L		5	ND	ND
1,2,4-Trichlorobenzene	ug/L	10	5	ND	ND
1,2-Dibromo-3-chloropropane	ug/L		0.04	ND	ND
1,2-Dibromoethane (EDB)	ug/L		0.0006	ND	ND
1,2-Dichlorobenzene	ug/L		3	ND	ND
1,2-Dichloroethane	ug/L		0.06	ND	ND
1,2-Dichloroethene, Total	ug/L			ND	24
1,2-Dichloropropane	ug/L		1	ND	ND
1,3-Dichlorobenzene	ug/L		3	ND	ND
1,4-Dichlorobenzene	ug/L		3	ND	ND
2-Butanone (MEK)	ug/L		50	ND	17
2-Hexanone	ug/L		50	ND	ND
4-Methyl-2-pentanone (MIBK)	ug/L			ND	ND
Acetone	ug/L		50	ND	43
Bromodichloromethane	ug/L		50	ND	ND
Bromoform	ug/L		50	ND	ND
Bromomethane	ug/L		5	ND	ND
Carbon disulfide	ug/L		60	ND	ND
Carbon Tetrachloride	ug/L		5	ND	ND
Chlorobenzene	ug/L		5	ND	ND
Chloroethane	ug/L		5	ND	3.6
Chloroform	ug/L		7	ND	6
Chloromethane	ug/L		5	ND	ND
cis-1,2-Dichloroethene	ug/L		5	ND	24
cis-1,3-Dichloropropene	ug/L		0.4	ND	ND
Cyclohexane	ug/L			ND	200
Dibromochloromethane	ug/L		50	ND	ND
Dichlorodifluoromethane	ug/L		5	ND	ND
Methyl Acetate	ug/L			ND	ND
Methylcyclohexane	ug/L			ND	240
Methylene Chloride	ug/L		5	ND	ND
Styrene	ug/L		5	ND	ND
Tetrachloroethene	ug/L		5	ND	ND
trans-1,2-Dichloroethene	ug/L		5	ND	ND
trans-1,3-Dichloropropene	ug/L		0.4	ND	ND
Trichloroethene	ug/L		5	ND	ND
Trichlorofluoromethane	ug/L		5	ND	ND
Vinyl chloride	ug/L		2	ND	14

SVOCs				
1,1'-Biphenyl	ug/L	5	ND	ND
2,4,5-Trichlorophenol	ug/L	3	ND	ND
2,4,6-Trichlorophenol	ug/L		ND	ND
2,4-Dichlorophenol	ug/L	5	ND	ND
2,4-Dimethylphenol	ug/L	50	ND	ND
2,4-Dinitrophenol	ug/L	10	ND	ND ND
2,4-Dinitrotoluene	ug/L	5	ND	ND
2,6-Dinitrotoluene	ug/L	5	ND	ND ND
2-Chloronaphthalene	ug/L	10	ND	ND ND
2-Chlorophenol	ug/L	10	ND	ND ND
2-Methylnaphthalene	ug/L		ND	8.7
2-Methylphenol			ND	ND
2-Nitroaniline	ug/L ug/L	5	ND	ND ND
2-Nitrophenol		3	ND	ND ND
3,3'-Dichlorobenzidine	ug/L ug/L	5	ND	ND ND
3-Nitroaniline		5	ND	ND ND
4,6-Dinitro-2-methylphenol	ug/L ug/L	3	ND	ND ND
4-Bromophenyl phenyl ether	ug/L		ND	ND ND
4-Chloro-3-methylphenol	ug/L		ND	ND ND
4-Chloroaniline	ug/L	5	ND	ND ND
4-Chlorophenyl phenyl ether	ug/L	,	ND	ND ND
4-Methylphenol			ND	ND ND
4-Nitroaniline	ug/L ug/L	5	ND	ND ND
4-Nitrophenol	ug/L	3	ND	ND ND
Acenaphthylene	ug/L		ND	1.9
Acetophenone	ug/L		ND	7.3
Atrazine	ug/L	7.5	ND	ND
Benzaldehyde	ug/L	7.5	ND	ND
Benzo(g,h,i)perylene	ug/L		ND	0.83
Bis(2-chloroethoxy)methane	ug/L	5	ND	ND
Bis(2-chloroethyl)ether	ug/L	1	ND	ND
Bis(2-chloroisopropyl) ether	ug/L	5	ND	ND
Bis(2-ethylhexyl) phthalate	ug/L	5	ND	1.8
Butyl benzyl phthalate	ug/L	50	ND	ND
Caprolactam	ug/L	30	ND	10
Carbazole	ug/L		ND	4.2
Dibenz(a,h)anthracene	ug/L		ND	1.1
Dibenzofuran	ug/L		ND	7.3
Diethyl phthalate	ug/L	50	ND	0.74
Dimethyl phthalate	ug/L	50	ND	ND

Di-n-butyl phthalate	ug/L		50	ND	0.74
Di-n-octyl phthalate	ug/L		50	ND	ND
Hexachlorobenzene	ug/L		0.04	ND	ND
Hexachlorobutadiene	ug/L		0.5	ND	ND
Hexachlorocyclopentadiene	ug/L		5	ND	ND
Hexachloroethane	ug/L		5	ND	ND
Isophorone	ug/L		50	ND	ND
Nitrobenzene	ug/L		0.4	ND	ND
N-Nitrosodi-n-propylamine	ug/L			ND	ND
N-Nitrosodiphenylamine	ug/L		50	ND	ND
Pentachlorophenol	ug/L			ND	ND
Phenol	ug/L	1		ND	ND
PCBs					
Aroclor 1016	ug/L			ND	ND
Aroclor 1221	ug/L			ND	ND
Aroclor 1232	ug/L			ND	ND
Aroclor 1242	ug/L			ND	ND
Aroclor 1248	ug/L			ND	ND
Aroclor 1254	ug/L			ND	ND
Aroclor 1260	ug/L			ND	ND
Aroclor 1262	ug/L			ND	ND
Aroclor 1268	ug/L			ND	ND
Metals (Dissolved)					
Arsenic	ug/L		25	ND	15
Barium	ug/L		1000	250	2800
Cadmium	ug/L		5	0.47	0.74
Chromium	ug/L		50	ND	1.3
Lead	ug/L		25	ND	4.4
Mercury	ug/L		0.7	ND	ND
Selenium	ug/L		10	ND	ND
Silver	ug/L		50	ND	ND

Notes:

ug/L - micrograms per liter

ND - Non-detect

9.3 Surface Water

Surface Water Investigation Yes No
SPDES Permit (Current or Past) Yes No
Industrial Waste Discharge Permit Yes No
Stormwater Data Yes No
Catch Basin Solids Data Yes No
Wastewater Data Yes No

In 2007, Texaco received a discharge permit from the NYCDEP that allows for the discharge of treated groundwater from the recovery system to be discharged to the sewer system after pre-treatment onsite. The permit is renewed on an annual basis. Currently and in accordance with a June 14, 2011, approval letter from NYCDEP, Texaco is conditionally authorized to discharge 43,200 gpd of treated effluent to the combined sewer. Compliance with the discharge permit requires one sample to be collected quarterly from the final treated discharge and analyzed for the list of constituents. Permit compliance has been maintained through the 4th quarter of 2011. Table 5 presents the most current results.

Table 5 NYCDEP Discharge Permit Compliance Results January 1, 2012 to March 31, 2012				
Analyte	NYCDEP Concentration Limit		TS-4 Post GAC 2: Treated Effluent (2/28/2012)	
	Daily	Monthly		
1,1,1-Trichloroethane (ug/L)			<5.0	
1,2,4-Trichlorobenzene (ug/L)			<9.8	
1,4-Dichlorobenzene (ug/L)			<5.0	
Aroclor 1016 (ug/L)			<0.057	
Aroclor 1221 (ug/L)			<0.057	
Aroclor 1232 (ug/L)			<0.057	
Aroclor 1242 (ug/L)			<0.057	
Aroclor 1248 (ug/L)			<0.057	
Aroclor 1254 (ug/L)			<0.057	
Aroclor 1260 (ug/L)			<0.057	
Benzene (ug/L)	134	57	6.8	
Cadmium - Total (mg/L)	2		0.00082J	
Carbon Tetrachloride (ug/L)			<5.0	
Carbonaceous Biochemical Oxygen Demand (mg/L)			25.1	
Chloride (mg/L)			10,500	
Chloroform (ug/L)			<5.0	
Copper - Total (mg/L)	5		0.0041J	
Ethylbenzene (ug/L)	380	142	2.9J	
Flashpoint (°F)	>140		>176.0	

Hexavalent Chromium -	5		<0.010
Total (mg/L)			
Lead - Total (mg/L)	2		0.0035J
Mercury - Total (mg/L)	0.05		<0.00020
Methyl-t-Butyl Ether (ug/L)	50		<5.0
Naphthalene (ug/L)	47	19	2.2J
Nickel - Total (mg/L)	3		0.0033J
Nitrate-Nitrite (mg/L-N)			<0.050
pH, Field (S.U.)	5-12		6.83
Phenol (ug/L)			<4.9
SGT Total Petroleum	50		<4.9
Hydrocarbons (mg/L)			
Temperature, Field (°C)	<150		8.9
Tetrachloroethene (ug/L)	20		<5.0
Toluene (ug/L)	74	28	<5.0
Total Kjeldahl Nitrogen (mg/L-N)			1.1
Total Residue, at 103°C (mg/L)			19,700B
Total Suspended Solids (mg/L)	350		<4.0
Total Xylenes (ug/L)	74	28	3.2J
Zinc - Total (mg/L)	5		0.074

Five New York City outfalls along the site bulkhead were identified in AECOM's RI/FS Work plan dated June 2011. These outfalls are not associated with the Former Paragon Oil Terminal. These outfalls are shown on Figure 7, and described in Table 6 below.

Table 6: Outfalls identified in AECOM's RI/FS Work plan dated June 2011					
Outfall ID	Outfall Location	Outfall Size	Type of Outfall	Property	
NCB- 0110060	10' W/O MEEKER STREET	3" DIA	Other NYC Identified Outfall	Former Paragon Oil Terminal	
NCB-292	400' E/O APOLLO STREET	10" DIA	Other NYC Identified Outfall	Former Paragon Oil Terminal	
NCB-294	500' E/O APOLLO STREET	12" DIA	Other NYC Identified Outfall	Former Paragon Oil Terminal	
NCB-554	275' E/O APOLLO STREET	6" DIA	Other NYC Identified Outfall	Former Paragon Oil Terminal	
NCB-555	25'W /O MEEKER AV	8" DIA	Other NYC Identified Outfall	Former Paragon Oil Terminal	

9.4 Sediment

Creek Sediment Data Yes
No

9.5 Air

Ambient air quality monitoring events have been ongoing since 2005 at the Empire Merchants warehouses and office spaces at 16, 42, and 50 Bridgewater Street on a bi-annual basis. Up to 16

SUMMA™ canisters are deployed across the site during each of the winter and summer sampling events. During the events, three SUMMA™ canisters are located outside of the buildings at ground level.

The laboratory results for ambient air quality monitoring events are summarized in Table 7. The laboratory data indicate that the subsurface LNAPL is not adversely affecting air quality.

Air Permit Yes ⊠No

Air Data
Yes No

Table 7 Summary of Ambient Air COPC Chemistry Former Paragon Oil Terminal Greenpoint, Brooklyn, NY

		Air Concentration	
Analyte	Units	Minimum	Maximum
1,1,1-Trichloroethane	ug/m3	0.4	3
1,1,2,2-Tetrachloroethane	ug/m3	ND	ND
1,1,2-Trichloroethane	ug/m3	ND	ND
1,1-Dichloroethane	ug/m3	ND	0.98
1,1-Dichloroethene	ug/m3	ND	ND
1,2,4-Trichlorobenzene	ug/m3	ND	ND
1,2,4-Trimethylbenzene	ug/m3	0.47	82
1,2-Dibromoethane	ug/m3	ND	ND
1,2-Dichlorobenzene	ug/m3	0.55	0.55
1,2-Dichloroethane	ug/m3	0.44	2.5
1,2-Dichloroethene, Total	ug/m3	ND	ND
1,2-Dichloropropane	ug/m3	3.6	4.1
1,2-Dichlorotetrafluoroethane	ug/m3	ND	ND
1,3,5-Trimethylbenzene	ug/m3	0.47	29
1,3-Butadiene	ug/m3	ND	ND
1,3-Dichlorobenzene	ug/m3	ND	ND
1,4-Dichlorobenzene	ug/m3	0.46	1.9
1,4-Dioxane	ug/m3	ND	ND
2,2,4-Trimethylpentane	ug/m3	0.85	280
2-Butanone (MEK)	ug/m3	0.97	41
2-Chlorotoluene	ug/m3	ND	ND
3-Chloropropene	ug/m3	ND	ND
4-Ethyltoluene	ug/m3	1.5	4.9
4-Isopropyltoluene	ug/m3	0.5	4.2

Accident	. / 2	6.4	220
Acetone	ug/m3	6.4	220
Benzene Benzel ebleride	ug/m3	0.5	56
Benzyl chloride Bromodichloromethane	ug/m3 ug/m3	ND ND	ND
Bromoethene		ND	ND
Bromoform	ug/m3	ND	ND
Bromomethane	ug/m3	ND	ND
Carbon disulfide	ug/m3 ug/m3	ND 0.64	ND 11
Carbon tetrachloride	ug/m3	0.04	8.2
Chlorobenzene	ug/m3		
Chloroethane	ug/m3	ND 0.29	ND 1.5
Chloroform			
Chloromethane	ug/m3	0.41	2.8 3.9
	ug/m3 ug/m3		
cis-1,2-Dichloroethane cis-1,2-Dichloroethene	ug/m3	ND 2.2	0.39
cis-1,3-Dichloropropene			
Cumene	ug/m3 ug/m3	ND 1.1	ND 86
Cyclohexane	ug/m3	0.5	490
Dibromochloromethane	ug/m3		
Dichlorodifluoromethane	ug/m3	ND 1.2	ND 15
Dichlorotetrafluoroethane	ug/m3		ND
Ethanol	ug/m3	ND 7.6	22000
Ethylbenzene	ug/m3	0.49	26
Freon 114	ug/m3	ND	ND
Freon 22	ug/m3	1.8	360
Freon TF	ug/m3	ND	1.7
Hexachlorobutadiene	ug/m3	18	18
Isopropyl Alcohol	ug/m3	12	130
m,p-Xylene	ug/m3	0.94	61
Methane	%	0.00021	0.0046
Methyl Butyl Ketone (2-Hexanone)	ug/m3	ND	ND
Methyl Butyl Ketone (2-Hexanone)	ug/m3	ND	ND
methyl isobutyl ketone	ug/m3	0.61	170
Methyl Methacrylate	ug/m3	2.8	13
Methyl tert-butyl ether	ug/m3	2.8	4.3
Methylene chloride	ug/m3	0.73	3300
Naphthalene	ug/m3	1.1	9.5
n-Butane	ug/m3	1.2	78
n-Butylbenzene	ug/m3	ND	ND
n-Heptane	ug/m3	0.94	15
n-Hexane	ug/m3	0.72	25

n-Hexane	ug/m3	0.72	550
n-Propylbenzene	ug/m3	0.64	10
o-Xylene	ug/m3	0.46	21
sec-Butylbenzene	ug/m3	1.3	3
Styrene	ug/m3	0.41	7.3
tert-Butyl alcohol	ug/m3	5.7	5.7
Tert-Butylbenzene	ug/m3	ND	ND
Tetrachloroethene	ug/m3	0.49	48
Tetrahydrofuran	ug/m3	ND	ND
Toluene	ug/m3	1.2	90
trans-1,2-Dichloroethene	ug/m3	ND	ND
trans-1,3-Dichloropropene	ug/m3	ND	ND
Trichloroethene	ug/m3	0.31	4.9
Trichlorofluoromethane	ug/m3	1	23
Vinyl chloride	ug/m3	ND	ND
Xylenes, Total	ug/m3	1.1	26

Notes:

ug/m3 - micrograms per cubic meter

mg/m3 - miligrams per cubic meter

ND - Non-detect

10.0 REMEDIATION HISTORY (INTERIM REMEDIAL MEASURES AND OTHER CLEANUPS)

Texaco has been conducting investigation and remedial action activities at the Paragon site since June 2005. Investigation activities have included:

- delineating the extent of petroleum-impacted soil,
- delineating the extent of petroleum-impacted groundwater, and
- delineating and identifying the source of the subsurface LNAPL in the saturated zone.

SAIC detailed the procedures, results, and interpretations of site characterization activities in the Site Characterization Report (2006) and Supplemental Site Characterization Reports (2007 and 2010).

An interim remedial measure (IRM) at the site focuses on eliminating a petroleum seep into Newtown Creek. The efforts included:

- installation of a below grade grout wall along the bulkhead,
- sealing seams on the steel bulkhead,
- operation of a 13-well Total Fluids Recovery (TFR) system, and
- maintenance of a creek-side containment boom system.

The collective efforts described above were initiated in 2006 and have successfully mitigated the petroleum seepage into the creek.

The grout wall is located immediately behind the steel bulkhead on the Paragon site in the vicinity of a historical seep of LNAPL into Newtown Creek. Grout wall construction was completed in November 2006. This grout wall extends 7 feet above and 7 feet below mean sea level.

Seams in the existing steel bulkhead were sealed with marine epoxy in September 2008. Monthly inspections are made and maintenance activities have been performed to maintain the competence of the sealed seams.

A TFR system recovers groundwater and LNAPL from a system of 11 recovery wells located immediately behind the grout wall on the Paragon site (Figure 8). The removal of LNAPL and impacted groundwater in order to maintain a reversed groundwater gradient away from the creek, has contributed to mitigating the seep.

A summary of characterization and remediation activates on the site is as follows:

- Delineation of soil and groundwater impacts
- Delineation of and identifications of the source of LNAPL
- Seep mitigation activities including grout wall installation, bulkhead seam sealing, maintenance of a creekside boom system, and operation of a TFR system.

The recovery system currently maintains a reversed hydraulic gradient during both high and low tide on the creek. The inward gradient is achieved by maintaining a groundwater elevation that is below the creek surface water elevation at both low and high tides. In 2011 NYSDEC gave Texaco approval to remove the outer containment boom system.

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- Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status Report, January 1, 2010 to March 31, 2010, April 30, 2010
- Request for Addendum to Water Quality Permit , May 3, 2010
- RE: Dewatering Permit Re-Application Request, Correspondence between SAIC and NYSDEC, May 3, 2010
- RE: Dewatering Permit Re-Application Request Cover Letter, Correspondence between SAIC and NYSDEC, May 3, 2010
- RE: Request for Addendum to Water Quality Permit, Correspondence between SAIC and NYSDEC, May 3, 2010
- Estimated Treated Effluent Discharge Volume, July 8, 2010
- RE: Estimated Treated Effluent Discharge Volume,, Correspondence between SAIC and NYSDEC, July 8, 2010
- Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status and Annual Progress Report, April 1, 2010 to June 3-, 2010, July 30, 2010
- Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status, July 1, 2010 to September 30, 2010, October 29, 2010
- Supplemental Site Characterization Report for the Former Paragon Oil Facility, 26 Bridgewater Street, Greenpoint, Brooklyn, New York, November 19, 2010
- Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status and Annual Progress Report, Oct 1, 2010 to Dec 31, 2010, January 31, 2011
- RE: Request for Addendum to Water Quality Permit, Correspondence between SAIC and NYSDEC, April 18, 2011
- Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status Report Jan-Mar 2011, May 2, 2011
- RE: Dewatering Permit Re-Application Request, Correspondence between SAIC and NYSDEC, May 31, 2011

RE: Estimated Treated Effluent Discharge Volume, Correspondence between SAIC and NYSDEC, July 1, 2011

Soil and Soil Vapor Alternatives Analysis Report, July 15, 2011

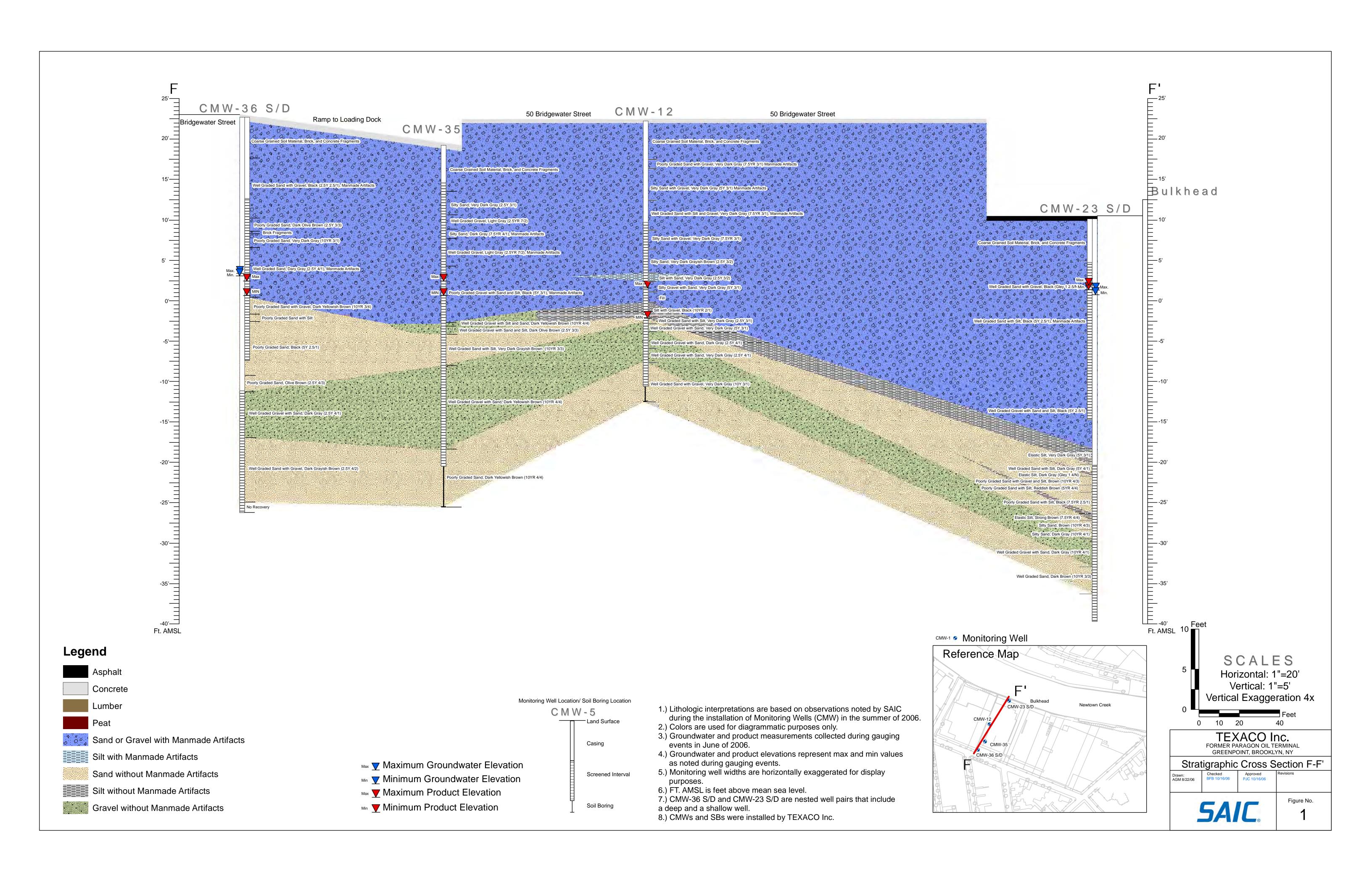
Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status Report Apr-Jun 2011, July 29, 2011

Groundwater and PSH Alternatives Analysis Report, August 12, 2011

Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status Report July-Sept 2011, October 31, 2011

Former Paragon Oil Terminal and the 100-120 Apollo Street Property, Texaco Facility #304209, Quarterly Status Report Oct-Dec 2011, January 31, 2012





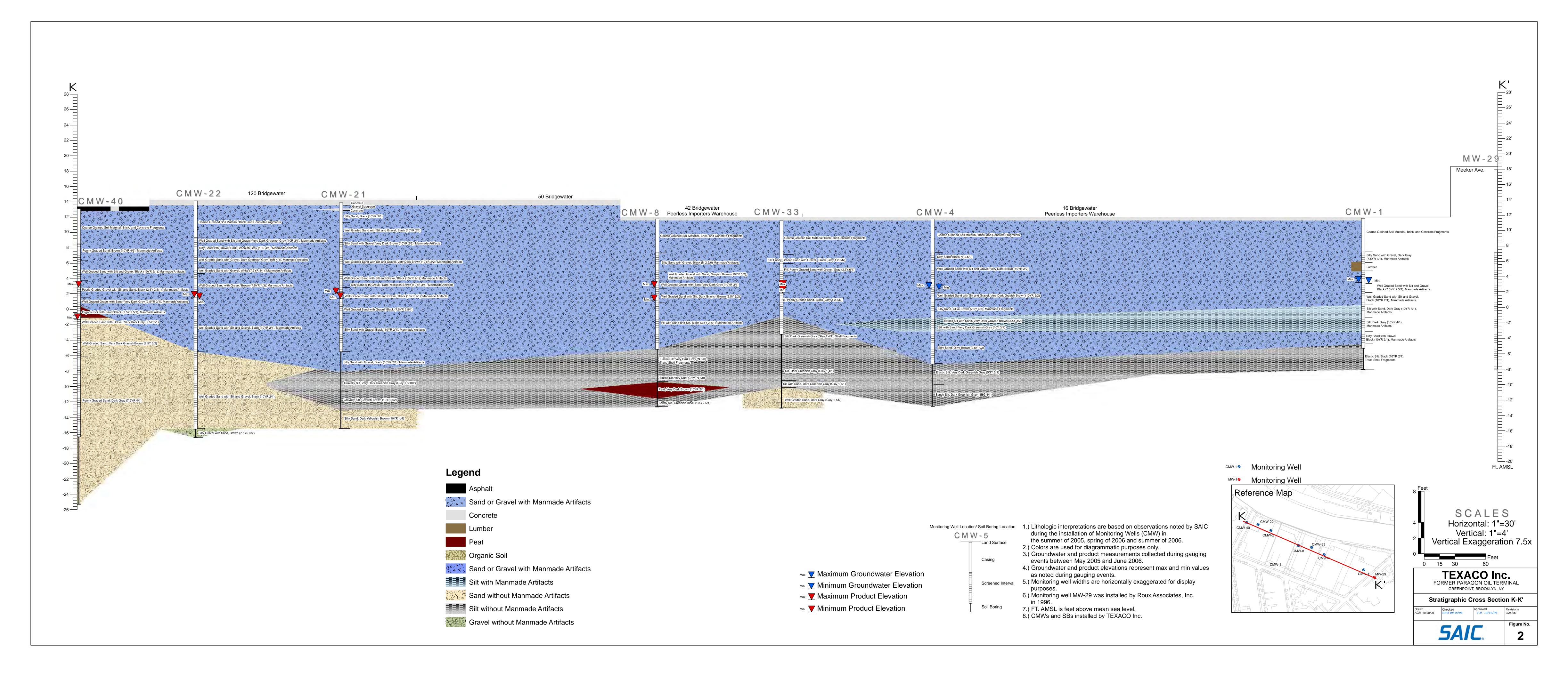


Figure 3
Reversed Hydraulic Gradient Concept Maintained to Mitigate Seep

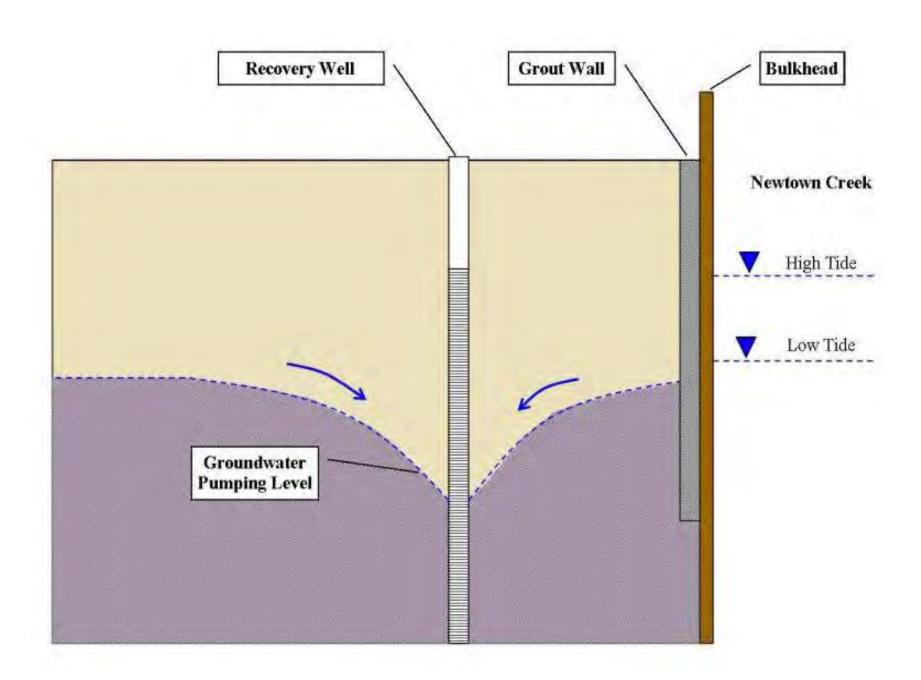


Figure 4
Comparison of Surface Water Elevation in Newtown Creek with
Groundwater Directly Behind the Bulkhead Along the Former Seep Area

Comparison taken at Low Tide on September 21, 2010 (14:35)

